O'MELVENY & MYERS LLP

Peter M. Friedman (pro hac vice forthcoming)

1625 Eye Street, NW

Washington, D.C. 20006

Telephone: (202) 383-5300

Facsimile: (202) 383-5414 E-mail: pfriedman@omm.com

Daniel S. Shamah

Diana M. Perez

Seven Times Square

New York, New York 10036

Telephone: (212) 326-2000

Facsimile: (212) 326-2061

E-mail: dshamah@omm.com

dperez@omm.com

Independent Counsel to the Foreign Representative

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

PERFORADORA ORO NEGRO, S. DE R.L. DE C.V., et al.,

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC) (Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that O'Melveny & Myers LLP ("O'Melveny") hereby appears in the above-captioned cases pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") as independent counsel for Fernando Pérez-Correa Camarena, in his capacity as Foreign Representative of Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro, S. de R.L. de C.V., with respect to certain specific matters pending before this Court in the above-referenced cases. O'Melveny requests, pursuant to Bankruptcy Rules 9007 and 9010(b), that all notices given or required to be given in these cases and all papers served or required to be served in these cases be given to and served upon the undersigned at the following office address, telephone numbers and e-mail address:

Peter M. Friedman (*pro hac vice* forthcoming) O'MELVENY & MYERS LLP 1625 Eye Street, NW Washington, D.C. 20006 Telephone: (202) 383-5300

Facsimile: (202) 383-5414 E-mail: pfriedman@omm.com

Daniel S. Shamah Diana M. Perez O'MELVENY & MYERS LLP Seven Times Square New York, New York 10036 Telephone: (212) 326-2000

Facsimile: (212) 326-2061 E-mail: dshamah@omm.com dperez@omm.com

This Notice of Appearance is not and shall not be construed as a waiver of any of the Foreign Representative's jurisdictional, substantive, or procedural rights and remedies in connection with the above-captioned proceeding, all of which are hereby expressly reserved.

Dated: July 18, 2019

New York, New York

Respectfully submitted,

/s/ Daniel Shamah

Daniel S. Shamah

O'MELVENY & MYERS LLP

Times Square Tower Seven Times Square

New York, New York 10036

Telephone: (212) 326-2000 Facsimile: (212) 326-2061 E-mail: dshamah@omm.co

E-mail: dshamah@omm.com

Independent Counsel to the Foreign Representative